Exhibit 231

AFIDAVIT OF NICOLAS BOURG

- I, NICOLAS EDMOND C. BOURG, hereby declare as follows under penalty of perjury:
- 1. I am a Belgian national, and currently reside in Belgium, where I was born on July 30, 1971. I attended the University of Leuven, where I studied economics. After my education I worked at a family business, C.P. Bourg, before transitioning to work in real estate investment projects. Together with my friend, Laurent Foucher, I established a company named "Niel". Distribution of participation shares in the charter capital of the said company between me and Laurent Foucher is 50/50.
- 2. I occupied the position of the sole Director of "Triadou SPV S.A." ("Triadou") from its formation in 2011 by myself and Ilyas Khrapunov ("Ilyas") until my termination in late 2014. As such, I worked closely with Ilyas on all aspects of Triadou's operations and management, and executed most of Triadou's investments, including those in the United States.
- 3. Ilyas told me that he was managing a large amount of Mukhtar Ablyazov's ("Ablyazov") money, and for that reason, Ablyazov was the ultimate decision maker on all of Triadou's investments. According to Ilyas, he had significant freedom in the management of various investments, but the final decisions were always received directly from Ablyazov. This arrangement was confirmed for me on several occasions when I observed that Ilyas needed to wait for Ablyazov's approval before authorizing a particular Triadou investment or payment.
- 4. I firstly met Mr Peter Sztyk in Paris in early 2011-2012 where he was introduced to me by Ilyas Khrapunov as an advisor of his remote relatives and of Mr Ablyazov. Mr Sztyk is a citizen of Canada and, it seems to me, is a half Ukrainian. He speaks the Russian language and, as far as I am aware, had previously lived in Dubai; now most of his time he resides in Geneva. Approximately fifteen years ago Mr Peter Sztyk worked as a lawyer at a law firm in Kazakhstan. It was the law firm where Bota (full name Botagoz Dzhardemali) his future wife also worked. As a lawyer Bota participated in legal defense of Mr Ablyazov. Mr Sztyk often visited Switzerland and supervised all important transactions as an advisor. As I already said he was a trusted advisor of Mr Khrapunov. He was always very reserved concerning the transactions and agreements with Ablyazov-Khrapunov family. Mr Sztyk was supposed to become a stakeholder of "Niel" if we were to reach an agreement regarding the transaction offered by Mr Khrapunov, but we did not reach such agreement.
- 5. As I heard the wife of Mr Peter Sztyk comes from quite a wealthy family in Kazakhstan. Bota is an attorney engaged into legal defense of Mr Ablyazov. I think that her principal task is to have Mukhtar Ablyazov released from the prison. My understanding of Bota's role is as follows: Ilyas Khrapunov is responsible for management of economic part of the business, and Bota is responsible for legal support. I heard that Bota purchased an apartment in Brussels, Belgium and received a refugee status. Living in Belgium she continues handling Mr Ablyazov's affairs.

I declare under penalty of perjury that the foregoing is true and correct.

This «?» NOV 2016

/Signature/ Nicolas Bourg

Sworn Before me onthis 2nd day of November 2016

Notabur Public

MUYINDEEN OLAJIDE Notary Public, State of New York No. 01 OL6 105455 Oualified in Kings County Commission Expires Feb. 9, 2020 BOURG 12